1 Allanna Warren 9620 S. Las Vegas Blvd., Suite E461 2 Las Vegas, NV 89123 d1a2n3n4@proton.me 3 (323) 807-6739 4 UNITED STATES DISTRICT COURT 5 DISTRICT OF NEVADA 6 ALLANNA WARREN, CASE NO.: 2:23-CV-00988-APG-DJA 7 8 Plaintiff, 9 VS. 10 PLAINTIFF REQUEST FOR EXTENSION HILTON GRAND VACATIONS OF TIME TO SUBMIT OPPOSITION TO 11 Defendant. **DEFENDANT'S MOTION TO DISMISS** 12 13 14 15 COMES NOW Plaintiff, ALLANNA WARREN, files her PLAINTIFF 16 REQUEST FOR EXTENSION OF TIME TO SUBMIT OPPOSITION TO DEFENDANT'S 17 MOTION TO DISMISS. This Motion is made and based upon all papers, pleadings, and records 18 on file herein, the attached Memorandum of Points and Authorities, and any oral argument 19 allowed at a hearing on this matter. 20 21 MEMORANDUM OF POINTS & AUTHORITIES 22 First, on June 28, 2023 the honorable Judge Gordon filed a minute order of the court 23 establishing that within 30 days of the date of the order both parties to this matter are to file a 24 joint status report that sets forth the status of this action, including a statement of action required 25 to be taken by this court. As of the date of this filing, PLAINTIFF has not heard anything from 26 27 the defendant concerning this report. Second, at the Eighth Judicial District Court, where this 28 PLAINTIFF DOCUMENT IN SUPPORT OF DEFAULT JUDGEMENT - 1

action was removed from, PLAINTIFF is being discriminated against. PLAINTIFF was not able

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to obtain a summons in this actions because the lower court required her to attend a hearing in order to obtain a summons. Exhibit 1, 2 and 3 are Notices of hearings served upon the PLAINTIIFF indicating that she has to attend a hearing in order to obtain a summons, although she has gone through the steps for the court to issue her a summons. Per NRCP rules PLAINTIFF is due a summons, issues by the court, when she files a complaint. PLAINTIFF could not obtain the summons from the court. Third, the summons does not negate the defendant's obligation to answer a complaint within the 21 days allotted to defendants to file an opposition or defense according to FRCP and NRCP rules. PLAINTIFF does not want to be redundant, but the defendant was served May 9, 2023 and did not respond to the complaint until the end of June, which is more than the 21 days. Therefore, they are still in default and have abandoned their opposition or defense to PLAINTIFF'S complaint. Third, because of law enforcement constantly being involved in PLAINTIFF'S civil affairs, including this action, PLAINTIFF has several other lawsuits she is responding to at this time. PLAINTIFF is seeking additional time to submit a thoughtful and complete opposition to defendant's Motion to Dismiss. PLAINTIFF is also going out of town, in a pre-planned trip, before the 19<sup>th</sup> of July. PLAINTIFF believes that by Sunday July 30, 2023 she should be able to have her opposition complete and filed into this action. This being said, PLAINTIFF will attempt to contact the defendant in order to complete the joint status report before she goes out of town, as it is due on July 28, 2023.

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**CONCLUSION** Therefore, PLAINTIFF is requesting an additional 11 calendar days to complete and file her opposition to defendant's Motion to Dismiss and will attempt to contact and complete the joint status report before it's due date. Dated this  $13^{th}$  day of July , 2023. Allanna Warren Pro Se Name Allanna Warren IT IS SO ORDERED: Dated:\_\_ July 19, 2023 ANDREW P. GORDON UNITED STATES DISTRICT JUDGE PLAINTIFF DOCUMENT IN SUPPORT OF DEFAULT JUDGEMENT - 3